

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO,
et al.,

Plaintiffs,

v.

THE STATE OF TEXAS, et al.,

Defendants.

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Consolidated Case No. 5:21-CV-0844-XR

FIFTH SUPPLEMENT TO LUPE PLAINTIFFS' INITIAL DISCLOSURES

Pursuant to Federal Rule of Procedure 26(a)(1), and Stipulated Disclosure Deadline For General Election Witnesses, ECF NO. 512, Plaintiffs La Union del Pueblo Entero, Friendship-West Baptist Church, the Anti-Defamation League Austin, Southwest, and Texoma Regions, Southwest Voter Registration Education Project, Texas Impact, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, Jolt Action, William C. Velasquez Institute, FIEL Houston Inc., and James Lewin (“Plaintiffs”) make the following supplemental disclosures:

I. Supplemental Disclosure Qualifications

These supplemental disclosures are made upon information presently known to Plaintiffs and without prejudice to Plaintiffs’ right to produce during discovery or at trial such data, information or documents as are: (a) subsequently discovered; (b) subsequently determined to be relevant for any purpose; or (c) subsequently determined to have been omitted from this and any supplemental disclosure statements. By making these disclosures, Plaintiffs do not represent that they are identifying every document, tangible thing, or witness that may be relevant to the issues

in this lawsuit, or on which Plaintiffs may rely in support of their claims or defenses. Nor do Plaintiffs waive their rights to object to the disclosure of any person, document, or thing on the basis of any applicable privilege, the work product doctrine, relevancy, competency, materiality, undue burden, hearsay, or any other valid objection in response to any discovery request or proceeding in this case. Further, Plaintiffs reserve all rights to present at trial or other hearing in this matter additional witnesses and evidence not presently identified or encompassed by these disclosures, and to present any rebuttal or impeachment evidence they deem appropriate.

II. Supplemental Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P.

In addition to the persons identified in Plaintiffs' previous disclosures, the following individuals are likely to have discoverable information that Plaintiffs may use to support their claims and/or defenses, not including information to be used solely for impeachment.

1. Tania Chavez, LUPE Executive Director

Ms. Chavez may be contacted through the Mexican American Legal Defense and Educational Fund, 110 Broadway, Ste. 300, San Antonio, Texas 78205. Ms. Chavez is likely to have knowledge of facts related to the effects of SB1 on Latino voters in the Rio Grande Valley.

2. Maria Gomez, LUPE volunteer

Ms. Gomez may be contacted through the Mexican American Legal Defense and Educational Fund, 110 Broadway, Ste. 300, San Antonio, Texas 78205. Ms. Gomez has

knowledge of the facts regarding the impact of SB1 on voters who need assistance with voting by mail.

3. Diana Maldonado, JOLT-TX Interim Executive Director

Ms. Maldonado may be contacted through the Mexican American Legal Defense and Educational Fund, 110 Broadway, Ste. 300, San Antonio, Texas 78205. Ms. Maldonado is likely to have knowledge of facts related to the effects of SB1 on Latino voters.

4. Sadia Tirmizi, on behalf of Texas Impact

Ms. Tirmizi may be contacted through the Brennan Center for Justice, 120 Broadway, Suite 1750, New York, New York 10271. Ms. Tirmizi is a member of Texas Impact and will likely have discoverable information regarding the impact of SB 1 on voter assistance and voters with disabilities.

5. Richard Ertel, on behalf of Texas Impact

Mr. Ertel may be contacted through the Brennan Center for Justice, 120 Broadway, Suite 1750, New York, New York 10271. Mr. Ertel is a member of Texas Impact and will likely have discoverable information regarding the impact of SB 1 on his willingness to serve as an election worker without facing the risk of criminal prosecution.

- B. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(ii))**

Plaintiffs make no supplements to the First Amended Initial Disclosures with respect to the documents in their possession, custody, or control beyond those which they have already identified and disclosed.

Dated February 24, 2023

Respectfully submitted,

/s/ Nina Perales

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CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2023, the foregoing document was served via e-mail to all counsel of record.

/s/ Julia Longoria

Julia Longoria